



notice requirements in Paragraph 3 of the Scheduling Order entered by this Court on September 11, 2018 [Doc. No. 349 in the Proskauer Case; Doc No. 2780 in the SEC Action], in connection with the Proskauer Rose, LLP Settlement that is the subject of the Scheduling Order.

As reflected in the Declarations of Ralph Janvey, Edward C. Snyder, John Little as Examiner, and Judith Blakeway, attached hereto as Exhibits 1 through 4, respectively, Movants have in all respects complied with the notice requirements contained in the Scheduling Order. This Notice is filed in order to comply with Paragraph 3(e) of the Scheduling Order, which requires Plaintiffs to file written evidence of compliance with the notice requirements in the Scheduling Order not less than ten days before the Final Approval Hearing.

Date: December 4, 2018.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

On December 4, 2018, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the Court. All parties who have appeared in this proceeding will be served via ECF. Investors and other interested parties will be served and given notice of the hearing on this Motion as approved by the Court.

/s/ Edward C. Snyder  
Edward C. Snyder

# **EXHIBIT 1**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

SECURITIES AND EXCHANGE	§	
COMMISSION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Civil Action No. 3:09-cv-0298-N
	§	
STANFORD INTERNATIONAL BANK,	§	
LTD., et al.,	§	
	§	
Defendants.	§	
<hr style="border: 0.5px solid black;"/>		
RALPH S. JANVEY, IN HIS CAPACITY	§	
AS COURT-APPOINTED RECEIVER	§	
FOR THE STANFORD RECEIVERSHIP	§	
ESTATE, AND THE OFFICIAL	§	
STANFORD INVESTORS COMMITTEE,	§	Civil Action No. 3:13-CV-0477-N-BG
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
PROSKAUER ROSE, LLP,	§	
CHADBOURNE & PARKE, LLP, AND	§	
THOMAS V. SJOBLUM,	§	
	§	
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**DECLARATION OF RALPH S. JANVEY**

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I, Ralph S. Janvey, of 2100 Ross Avenue, Suite 2600, Dallas, Texas 75201, state as follows:

1. I am the Court-appointed Receiver in the above-captioned lawsuit. I am over the age of 21 years and am competent to make this Declaration. The facts and statements contained

in this Declaration are based upon personal knowledge or review of records and information provided by Receivership professionals.

2. I submit this Declaration pursuant to paragraph 3(e) of the Proskauer Rose LLP Settlement Scheduling Order (the “Scheduling Order”<sup>1</sup>) entered by the Court on September 11, 2018 in the above-captioned lawsuits.

3. Pursuant to paragraph 3(a) of the Scheduling Order and in compliance therewith, the Receivership “cause[d] the Notice in substantially the same form attached as Exhibit A to the Settlement Agreement to be sent via electronic mail, first class mail, or international delivery service to all Interested Parties” on September 28, 2018. Although not required to do so under the terms of the Scheduling Order, the Receivership also sent a Spanish translation of the Notice to the same Interested Parties on September 28th.

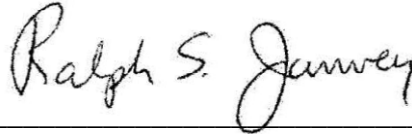
4. Pursuant to paragraph 3(c) of the Scheduling Order and in compliance therewith, the Receivership “cause[d] the Settlement Agreement, the Motions, th[e] Scheduling Order, the Notice, and all exhibits and appendices attached to these documents [collectively, “Settlement Documents”], to be posted on the Receiver’s website (<http://stanfordfinancialreceivership.com>)” on September 28, 2018. Although not required to do so under the terms of the Scheduling Order, the Receivership also took the following actions on September 28, 2018: (1) posted a set of Frequently Asked Questions (“FAQs”) related to the Settlement to <http://stanfordfinancialreceivership.com>; (2) posted the Settlement Documents and the FAQs to <http://stanfordfinancialclaims.com>; (3) posted Spanish translations of the Settlement Documents to <http://stanfordfinancialreceivership.com> and <http://stanfordfinancialclaims.com>; and (4) posted

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<sup>1</sup> The Scheduling Order is Doc. No. 2563 in Civil Action No. 3:09-cv-0298-N and Doc. No. 235 in Civil Action No. 3:12-cv-04641-N.

a Spanish set of the FAQs to <http://stanfordfinancialreceivership.com> and <http://stanfordfinancialclaims.com>.

I state under penalty of perjury that the foregoing is true and correct. Executed on this 30th day of November 2018.

A handwritten signature in black ink that reads "Ralph S. Janvey". The signature is written in a cursive style with a large, looped "J" at the end.

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Ralph S. Janvey

# **EXHIBIT 2**





*Stanford Receivership Estate, and the Official Stanford Investors Committee v. Proskauer Rose, LLP, et al* (the “Proskauer Case”).

3. Pursuant to Paragraph 3 of the Scheduling Order entered by this Court on September 11, 2018 [Doc. No. 349 in the Proskauer Case; Doc No. 2780 in the SEC Action] in connection with the proposed Proskauer Rose, LLP Settlement Agreement, the Receiver, OSIC, and the Examiner were ordered to take certain steps to provide interested parties with notice of the Settlement and its effects, including the releases and injunctions provided for in the Bar Orders and Judgment and Bar Order, their rights and the deadlines to object to the Settlement, the Bar Order, the Judgment and Bar Order, and Plaintiffs’ request for approval of Plaintiffs’ attorneys’ fees, and the date of and right to appear at the Final Approval Hearing.

4. My law firm Castillo Snyder, lead counsel for the Plaintiffs, coordinated the publication of the notice required under Paragraph 3(b) of the Scheduling Order, and the notice was published as required in the *Wall Street Journal* and the international edition of the *New York Times* on October 1, 2018 (WSJ) and October 2, 2018 (NYT), respectively.

5. The Receiver and OSIC have in all aspects complied with the notice requirements set forth in Paragraph 3 of the Scheduling Order.

Executed December 4, 2018.

/s/ Edward C. Snyder

Edward C. Snyder

# **EXHIBIT 3**



consideration of a proposed settlement entered into by and between, on the one hand, (i) Ralph S. Janvey, solely in his capacity as Receiver for the Stanford Receivership Estate; (ii) the Official Stanford Investors Committee (the “OSIC”); and (iii) Sandra Dorrell and Phillip A. Wilkinson (the “Investor Plaintiffs”); and, on the other hand, (iv) Proskauer Rose, LLP.

4. Specifically, I was directed, no later than twenty-one (21) calendar days after entry of the Court’s Scheduling Order, to “cause the [Proskauer Rose, LLP] Settlement Agreement, the Motion, this Scheduling Order, the Notice, and all exhibits and appendices attached to these documents, to be posted on the Examiner’s website (<http://lpf-law.com/examiner-stanford-financial-group>).” Doc. No. 2780 at 5. The Scheduling Order was entered on September 11, 2018.

5. English language versions of the Scheduling Order, the Notice, the Motion to Approve, the Agreement, and the Appendix in support of the Motion to Approve (which contained all appendices and exhibits) were posted to the Examiner’s website, together with a narrative description of the Settlement, on September 25, 2018, in compliance with the requirements of the Scheduling Order.

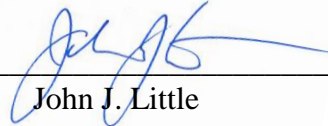
6. Although not required by the Scheduling Order, Spanish language versions of the Scheduling Order, the Notice, the Motion to Approve, and the Agreement were posted to the Examiner’s website on September 25, 2018, together with a Spanish version of the narrative description of the Settlement.

7. Although not required by the Scheduling Order, the Receiver, the Examiner and the OSIC crafted a set of seven (7) “frequently asked questions” concerning the Proskauer Rose, LLP Settlement. Those “frequently asked questions” were posted to the Examiner’s website in both English and Spanish on September 25, 2018.

8. I have attached to this Declaration, as Exhibit 1, a true and correct copy of the English and Spanish materials that were posted to the Examiner's website relating to the Proskauer Rose, LLP Settlement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 30, 2018.



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John J. Little

## EXHIBIT 1

**Last Update September 25, 2018**

### **Receiver and Official Stanford Investors Committee Announce Settlement with Proskauer Rose LLP.**

On August 24, 2018, the Receiver, the Official Stanford Investors Committee (“OSIC”) and certain individual Investor Plaintiffs filed a Motion seeking Court approval of a settlement entered into with Proskauer Rose, LLP (“Proskauer”). Pursuant to the terms of the settlement, the Receivership Estate will receive \$63 million. On September 11, 2018, the Court entered a Scheduling Order setting a hearing on the Motion to Approve the Proskauer Settlement and establishing a schedule for the submission of objections.

The Court has set a hearing on the Motion to Approve the Proskauer Settlement at **10:00 a.m. on Friday, December 14, 2018**. Any party wishing to file an objection to the Proskauer Settlement must do so no later than ***Friday, November 23, 2018***.

You may access the materials pertaining to the Proskauer Settlement by clicking on the links below:

- Scheduling Order, click **HERE** (English) and **HERE** (Spanish)
- Motion to Approve Proskauer Settlement (English only), click **HERE**
- Appendix in Support of Motion to Approve Proskauer Settlement (English only), click **HERE**
- Settlement Agreement, click **HERE** (English) and **HERE** (Spanish)
- Proposed Bar Order (SEC Action) (Exhibit B), click **HERE** (English) and **HERE** (Spanish)
- Proposed Judgment and Bar Order (Receiver Action) (Exhibit C), click **HERE** (English) and **HERE** (Spanish)
- Notice of Settlement and Bar Order Proceedings (Exhibit A), click **HERE** (English) and **HERE** (Spanish)
- Publication Notice (Exhibit G), click **HERE** (English) and **HERE** (Spanish)

## **PROSKAUER SETTLEMENT FAQs:**

**Q. Why did the Plaintiffs and Receiver settle with Proskauer for \$63 million?**

A. The reasons for the amount of the settlement are discussed at length in the Motion to Approve the Settlement and the Declarations included in the Appendix to the Motion. You can review the Motion to Approve the Settlement and the supporting Appendix by clicking on the links above.

**Q: If approved, which Stanford investors will be entitled to distributions from the Proskauer Settlement?**

A: Proceeds available for distribution from the Proskauer Settlement will be distributed on a pro rata basis to all Stanford Investors who (a) have Allowed Claim Amounts determined by the Receiver's claim and distribution process, and (b) have submitted a completed Certification Notice to the Receiver (as required by the Court's Order approving the Receiver's First Interim Distribution). After the Court approves the Proskauer Settlement and that approval has become final, the Receiver will file a motion proposing and asking the Court to approve a specific distribution plan for available proceeds from the Proskauer Settlement.

**Q: How do I object to the Proskauer Settlement or its terms?**

A: Any objection to the Proskauer Settlement or its terms, the Motion to Approve the Settlement, the Application for Attorneys' Fees, or the Judgments and Bar Orders must be filed in writing with the Court in the SEC Action no later than **November 23, 2018**. Any objections not filed by that date will be deemed waived and will not be considered by the Court. Those wishing to appear and present objections at the Final Approval Hearing must include a request to appear in their written objections. Please refer to the Scheduling Order and Notice (available at the links above) for additional instructions.

**Q: When will the Court make a final determination on the Motion to Approve the Settlement?**

A: The Final Approval Hearing is set for **Friday, December 14, 2018 at 10:00 AM**. The Court will issue its decision at the hearing or some point thereafter.



**Q: If the Court approves the motion, when can I expect my distribution payment?**

A: The Proskauer Settlement contemplates that the Receiver will file a Motion for approval of a distribution plan after the Court approves the settlement and the settlement amount has been paid to the Receiver.

The timing of the payment of the settlement amount will depend, first, upon when the Court enters its order approving the Proskauer Settlement and, second, upon whether any objecting party pursues an appeal from the Court's order approving the settlement.

The timing of the Court's approval and any subsequent distribution has yet to be determined. As additional information becomes available, the Receiver and Examiner will post updates to the Stanford Financial Group Receivership websites and to the Examiner's website.

**Q: I have already filed a Proof of Claim form with the U.S. Receiver. Do I need to file another Proof of Claim form to be considered in the Proskauer Distribution Plan?**

A: NO. If you have already filed a Proof of Claim form with the U.S. Receiver, you DO NOT need to file another form. There is no further action required by you at this time.

**Q: I have not received a Notice of Determination with my claim number. How can I be sure you received my Proof of Claim Form?**

A: You should contact the Receiver's Claims Agent to request your claim number:

1. By email at [info@stanfordfinancialclaims.com](mailto:info@stanfordfinancialclaims.com)
2. By phone at 866-964-6301 or 317-324-0757.

**Administrador Judicial y el Comité Oficial de Inversionistas de Stanford Anuncian un Acuerdo con Proskauer Rose LLP.**

El día 24 de agosto de 2018, el Administrador Judicial, el Comité Oficial de Inversionistas de Stanford y ciertas otras Partes Actoras presentaron una Moción solicitando la aprobación del Juzgado para un Convenio entre Proskauer Rose, LLP (“Proskauer”). Conforme a los términos del acuerdo, la Administración Judicial recibirá \$63 millones. El día 11 de septiembre de 2018, el Juzgado sometió un Auto de Programación donde establece una audiencia sobre la Moción para aprobar el Convenio de Transacción Judicial Proskauer y establecer la programación para la presentación de objeciones.

El Juzgado ha establecido la audiencia sobre la Moción para Aprobar la Transacción Judicial Proskauer para el día **viernes, 14 de diciembre de 2018, a las 10:00 am.** Cualquier parte que desee presentar una objeción al Convenio Proskauer deberá hacerlo a más tardar **el viernes, 23 de noviembre de 2018.**

Podrá obtener acceso a los materiales concernientes al Convenio Proskauer al seleccionar los enlaces establecidos a continuación:

- Auto de Programación, seleccione [AQUÍ](#) (inglés), seleccione [AQUÍ](#) (español)
- Moción para Aprobar Convenio Proskauer (solo inglés), seleccione [AQUÍ](#)
- Apéndice en Apoyo a la Moción para Aprobar el Convenio Proskauer (solo inglés), seleccione [AQUÍ](#)
- Convenio de Transacción Judicial, seleccione [AQUÍ](#) (inglés), seleccione [AQUÍ](#) (español)
- Auto de Exclusión Propuesto (Acción SEC) (Anexo B), seleccione [AQUÍ](#) (inglés), seleccione [AQUÍ](#) (español)
- Auto de Exclusión y Resolución Definitivos Propuesto (Acción del Administrador Judicial) (Anexo C), seleccione [AQUÍ](#) (inglés), seleccione [AQUÍ](#) (español)
- Notificación del Convenio y Procedimientos del Auto de Exclusión (Anexo A), seleccione [AQUÍ](#) (inglés), seleccione [AQUÍ](#) (español).
- Aviso de Publicación (Anexo G), seleccione [AQUÍ](#) (inglés), seleccione [AQUÍ](#) (español).

### **Preguntas Frecuentes sobre el Convenio de Transacción Judicial Proskauer:**

**P: ¿Por qué los demandantes y el Administrador Judicial resolvieron con Proskauer por \$63 millones?**

R: Las razones por el monto del convenio se discuten a fondo en la Moción para Aprobar Transacción Judicial y en las Declaraciones incluidas en el Apéndice de la Moción. Usted puede revisar la Moción para Aprobar el Convenio y los apéndices de apoyo entrando a los enlaces arriba mencionados.

**P: En caso de que fuere aprobado, ¿cuáles inversionistas de Stanford tendrían derecho a distribuciones bajo el convenio de Proskauer?**

R: Las sumas de dinero del convenio de Proskauer que serán disponibles para distribución serán distribuidas de manera proporcional entre todos los inversionistas de Stanford quienes (a) cuenten con Cantidades de Reclamación Permitidas determinadas por el proceso de reclamación y distribución del Administrador Judicial, y (b) hayan presentado un Formulario de Certificación completo al Administrador Judicial (tal y como se requiere por el Auto Judicial que aprueba la Primera Distribución Provisional del Administrador Judicial). Luego de que el Juzgado apruebe el Convenio Proskauer y esa aprobación sea definitiva, el Administrador Judicial someterá una moción proponiendo y peticionando al Juzgado que se apruebe un plan de distribución específico para las sumas de dinero procedentes del Convenio Proskauer.

**P: ¿Cómo puedo objetar al Convenio Proskauer o a sus términos?**

R: Cualquier objeción al Convenio de Transacción Judicial Proskauer o a sus términos, a la Moción para Aprobar Transacción Judicial, a los Honorarios de Abogados o a la Sentencia y al Auto de Exclusión, deberán presentarse por escrito ante el Tribunal en la Acción SEC (por sus siglas en inglés, Securities Exchange Commission – Comisión de la Bolsa de Valores de EE.UU.), a más tardar el **23 de noviembre de 2018**. Cualquier objeción presentada después de dicha fecha se considerará como renunciada y el Juzgado no la tomará en consideración. Aquellos que deseen comparecer y presentar objeciones en la Audiencia de Aprobación Definitiva deben incluir una solicitud de comparecencia a través de sus objeciones sometidas por escrito. Para cualquier instrucción adicional, favor de referirse al Auto de Programación y a la Notificación, que se encuentran en los enlaces arriba mencionados.

**P: ¿En qué momento el Juzgado tomará su decisión final sobre la Moción para Aprobar Transacción Judicial?**

R: La Audiencia de Aprobación Definitiva está programada para el **viernes, 14 de diciembre de 2018, a las 10:00 am.** El Juzgado emitirá su fallo en la audiencia o en algún momento posterior.

**P: En caso que el Juzgado autorice la moción, ¿cuándo podré recibir el pago de distribución que me corresponde?**

R: El Convenio Proskauer contempla que el Administrador Judicial presente la Moción para la aprobación de un plan de distribución después de que el Juzgado apruebe el convenio y el monto convenido sea pagado al Administrador Judicial.

El momento del pago del monto convenido depende, primero de cuando el Juzgado someta la Moción aprobando el Convenio Proskauer y, segundo, si alguna parte objetante someta una apelación a la Moción sometida por el Juzgado aprobando el Convenio.

Todavía hace falta que se determine el momento de la aprobación del Tribunal y cualquier distribución subsecuente. En cuanto contemos con información adicional, el Administrador Judicial y el Interventor publicarán las actualizaciones en los sitios web del Síndico de Stanford Financial Group y en los sitios web del Interventor.

**P: Ya presenté una forma de Forma de Prueba de Reclamación ante el Administrador Judicial de los Estados Unidos. ¿Es necesario que presente otra forma de Prueba de Reclamación para ser considerado dentro del Plan de Distribución Proskauer?**

R: NO. Si usted ya presentó una forma de Prueba de Reclamación ante el Administrador Judicial de los Estados Unidos, Usted NO necesita presentar otra forma. Por el momento no se requiere que realice acción adicional.

**P: No he recibido el Aviso de Determinación con mi número de reclamación. ¿Cómo confirmo que recibieron mi forma de Prueba de Reclamación?**

R: Debe comunicarse con el Agente de Reclamaciones del Administrador Judicial para solicitar su número de reclamación:

- (1) por correo electrónico [info@stanfordfinancialclaims.com](mailto:info@stanfordfinancialclaims.com), o
- (2) por teléfono: 866-964-6301 o 317-324-0757.

# **EXHIBIT 4**



the Notice of Settlement and Bar Order Proceedings (the “Notice”)”be sent via electronic service to all counsel of record for any person who has been or is, at the time of Notice, a party in any case included in *In re Stanford entities Securities Litigation*, MDL No. 2099 (N.D. Tex.) (the “MDL Proceeding”), the SEC Action, or the Litigation, who are deemed to have consented to electronic service through the Court’s CM/ECF System under Local RuleCV-5.1(d).”

3. The Clerk of the Court caused the Notice of Settlement and Bar Order Proceedings to be filed on the electronic case dockets of all open and pending Stanford-related actions in the MDL proceeding on September 14, 2018.

4. Accordingly, the undersigned hereby certifies compliance with paragraph 3(a) of the Scheduling Order.

/s/Judith R. Blakeway

Judith R. Blakeway